

LAW OFFICES OF WILLIAM B. HILDEBRAND L.L.C.

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WH:4166

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Martha Jane Toy, individually, and as Executrix and Personal Representative of Estate of Russell B. Toy, deceased,

Plaintiffs,

v.

Plumbers & Pipefitters Local Union No. 74 Pension Plan, Trustees of Plumbers & Pipefitters Local Union No. 74 Pension Plan, Health and Welfare Plan, Local 74, Welfare Benefit Plan, Life Insurance Plan, Local 74, Welfare Benefit Plan, Life Insurance Plan, Local 74, Insurance Plan, Administrators of Pension and Welfare Plans, Trustees of Plumbers & Pipefitters Local Union No. 74 Welfare Plan, Plan Administrator of Pension & Welfare Plans, Insurance Plans, and Health and Welfare Benefit Plan,

Defendants.

C.A. No. 05-1814

**PLAINTIFF'S BRIEF IN OPPOSITION TO DEFENDANTS' MOTION TO
DISMISS FOR FAILURE TO STATE A CLAIM AND IMPROPER VENUE**

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On the Brief:

William B. Hildebrand

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C.A. No. 05-1814

Defendants.

State of New Jersey : :

SS : :

County of Camden : :

WILLIAM B. HILDEBRAND, ESQ. hereby deposes and says:

1. Attached as Exhibit "A" is a true and correct copy of a letter which John M. Stull, Esq. sent to John J. Czerwinski in December, 2004.
2. To date, Defendants have not provided the requested information and materials.

Dated:

____ s/ William B. Hildebrand ____
William B. Hildebrand